

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division

JANE E. BETHEL

Plaintiff,

v.

Civil Action No.: 2:15-cv-501

CITY OF NORFOLK

Defendant.

JANE E. BETHEL'S MOTION TO FILE CERTAIN DOCUMENTS UNDER SEAL

COME NOW, plaintiff Jane E. Bethel ("Bethel"), by counsel, pursuant to Rule 5.2 of the Federal Rules of Civil Procedure and Rule 5 of the Local Civil Rules of the United States District Court for the Eastern District of Virginia and moves this Honorable Court to enter an order that all exhibits filed in support of Jane E. Bethel's Memorandum in Opposition to City of Norfolk's Motion for Summary Judgment (Document No 59) all be filed under seal for the reasons stated in the accompanying memorandum in support of this motion. The documents to be placed under seal would be Documents 59-1 through 59-15.

JANE E. BETHEL

/S/ W. Barry Montgomery
W. Barry Montgomery, Esq. (VSB# 43042)
Counsel for Jane E. Bethel
KALBAUGH, PFUND & MESSERSMITH, PC
901 Moorefield Park Drive, Suite 200
Richmond, Virginia 23236
Tel: (804) 320-6300
Fax: (804) 320-6312

E-mail: barry.montgomery@kpmlaw.com

Certificate of Service

I hereby certify that on February 6, 2017, I did file the foregoing document with the Clerk of this Court using Electronic Case Filing ("ECF") which then sent a Notice of Electronic Filing ("NEF") to the following persons:

Heather A. Mullen, Esq. (VSB 29239)
City of Norfolk Department of Law
810 Union Street, Room 900
Norfolk, VA 23510
Tel: (757) 664-4529
Fax: (757) 664-4201
Heather.mullen@norfolk.gov
Counsel for Defendant

/S/ W. Barry Montgomery
W. Barry Montgomery, Esq. (VSB# 43042)
Counsel for Jane E. Bethel
KALBAUGH, PFUND & MESSERSMITH, PC
901 Moorefield Park Drive, Suite 200
Richmond, Virginia 23236
Tel: (804) 320-6300
Fax: (804) 320-6312
E-mail: barry.montgomery@kpmlaw.com